



April 16, 2004

Ms. Sharon Jaffess
Remedial Project Manager
US EPA Region 5
Superfund Division
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

RE: Ashland/NSP Lakefront Superfund Site
WDNR BRRTS #02-02-00013
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN057952
Addendum Work Plan for Collection of Smelt, *Osmerus mordax*

Dear Ms. Jaffess:

Thanks for your timely approval of the above. As Jerry Winslow reported earlier today, URS will be on site next week to perform the smelt sampling as described in the addendum work plan. We had a report that smelting began in earnest this week, two days ago. Although the window is narrow (the migratory run usually lasts for about one week), we should be able to accomplish this work.

We would like to clarify two points raised in your comments in your April 14, 2004 approval. We agree with your description of smelt ecology and their potential for impact from the site. As you noted we will be collecting smelt to support both the human health and the ecological risk assessment. To this end, we had planned to prepare them somewhat differently than the "conventional" smelt collection method. Smelt are typically cleaned for cooking by cutting along their body cavity and scraping out the entrails. After cooking, most fishermen remove the head along with the attached skeletal structure (backbone and ribs), and discard it before eating (although some will also eat the head and bones, which are soft). We had therefore planned on removing the internal organs and head, and then analyzing the remainder of the fish.

With regard to completing the forms for the Passaic River SOP, we believe that for smelt, if it is necessary to conduct any examination, it should only be for the external one (pages 14 and 15 of the SOP). We believe this is appropriate because, as you mentioned, smelt are not resident in the site area but pass through it. The substantial extra effort associated with an internal examination is not warranted, considering the smelt's potential for having histopathological abnormalities related to the site. It is the demersal and near bottom species that are typically vulnerable to these effects and not the pelagic, migratory species.

Please let us know if this approach is acceptable.

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Sincerely,

NEWFIELDS

A handwritten signature in black ink that reads "David P. Trainor". The signature is written in a cursive style with a large, stylized "D" and "T".

David P. Trainor
Associate

cc: Mr. Jamie Dunn
Mr. Jerry Winslow
Mr. Bert Cole
Dr. Weldon Bosworth

nsp/smelt/jaffess0416ltr